

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

Shimshon Wexler,	)	C.A. NO.: 6:16-cv-01492-TMC-KFM
	)	
Plaintiff,	)	
	)	
v.	)	<b>DEFENDANTS' MOTION FOR THE</b>
	)	<b>ENTRY OF A PROTECTIVE ORDER</b>
LVNV Funding, LLC; and Resurgent Capital	)	
Services, LP,	)	
	)	
Defendants.	)	
	)	

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the defendants, LVNV Funding, LLC (“LVNV”) and Resurgent Capital Services, LP (“Resurgent”), will move the Court for the entry of an order precluding Plaintiff Shimshon Wexler from seeking discovery relating to certain agreements between Sherman Originator III, LLC, and Chase Bank USA, N.A. (the “Account Purchase Agreements”). In support of their motion, Defendants state the following:

1. On July 12, 2016, Plaintiff served requests for production of documents upon LVNV which seek the disclosure of the Account Purchase Agreements, which are confidential agreements between a corporate affiliate of LVNV, Sherman Originator III, LLC, and Chase Bank USA, N.A that are entitled to trade secrets protection and their disclosure would harm Defendants.
2. Under Fed. R. Civ. P. 26(c), good cause exists for this Court to issue a protective order to protect Defendants from harm by precluding Plaintiff from seeking discovery regarding the Account Purchase Agreements.

This motion is based on the pleadings, the Federal Rules of Civil Procedure, Defendants' memorandum in opposition to Plaintiff's motion to compel and in support of this motion, and the applicable common and statutory law in support of this motion.

Respectfully submitted,

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Greenville, South Carolina